

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA  
PLAINTIFF,

V.

Case No. 4:15-CR-00151-O(29)

AMBER SHAW  
DEFENDANT.

**DEFENDANT AMBER SHAW'S  
MOTION FOR CONTINUANCE OF SENTENCING HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

The Defendant in the above styled and numbered cause, AMBER SHAW, under the Sixth Amendment to the United States Constitution and 18 U.S.C. 3161(h)(8), respectfully moves the Court for an order continuing the present sentencing hearing date of June 21, 2016 at 9:00 a.m. In support of this motion, AMBER SHAW would show the Court as follows:

**I.**

Counsel for the Defendant needs additional time to prepare due to a death in the family. Moreover, Defendant's cooperation is ongoing. Defendant is requesting a continuance until after December 31, 2016 due to information is still being developed for a possible 5(K) motion. Further, pending legislation before Congress may have a substantial effect on the sentencing guidelines as applied to this defendant.

This Motion for Continuance is not made for purposes of delay, but that justice may be done.

The Defendant waives the right to a speedy trial conditioned on the Court's granting of this motion.

**II.**

Counsel for the Defendant conferred with Assistant United States Attorney Shawn Smith about this motion on June 20, 2016. The government is NOT opposed to this motion.

AMBER SHAW prays that the Court enter an order continuing the sentencing hearing date of June 21, 2016.

Respectfully Submitted,

/s/ Patrick G. Barkman

Patrick G. Barkman

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Attorney for the Defendant,

AMBER SHAW

**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the Defendant AMBER SHAW's Motion for Continuance was emailed to Shaw Smith, Assistant United States Attorney on the 20<sup>th</sup> day of June, 2016.

/s/ Patrick G. Barkman

Patrick G. Barkman

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**ORDER ON DEFENDANT AMBER SHAW'S  
MOTION FOR CONTINUANCE OF SENTENCING HEARING**

Defendant AMBER SHAW's Motion for Continuance is hereby:

\_\_\_\_\_ GRANTED

\_\_\_\_\_ DENIED

Signed in \_\_\_\_\_, Texas on this the \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
United States District Judge